

**ORIGINAL**

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Docket No. MC98-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS ROTHSCHILD TO INTERROGATORIES OF  
OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T4-34-35)

The United States Postal Service hereby provides the response of witness Rothschild to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-T4-34-35, filed on August 13, 1998.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

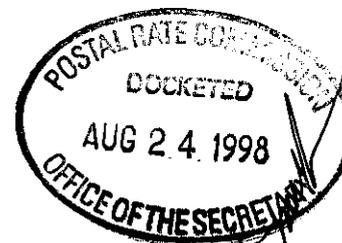
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Scott L Reiter

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August 24, 1998



RESPONSE OF POSTAL SERVICE WITNESS ROTHSCHILD  
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OCA/USPS-T4-34. Please refer to USPS-LR-2/MC98-1, pages 30-37.

- a. USPS-LR-2, page 30 indicates that "[t]he weighted survey results for questions 4, 7, 8, 11, 14, and 15 provide raw estimates of NetPost volume under each price and product configuration scenario." Please provide a copy of the survey summary results for each of the 6 questions referenced.
- b. Please refer to Table 15, page 34. For each year and for each cell within Table 15, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.
- c. Please refer to Table 16, page 35. For each year and for each cell within Table 16, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.
- d. Please refer to Table 17, page 36. For each year and for each cell within Table 17, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.
- e. Please refer to Table 18, page 37. For each year and for each cell within Table 18, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.

RESPONSE: This information is being filed as Library Reference 12. (The information requested in part (a) is provided in the printed tables and the derivations requested in parts (b) through (e) are embedded in the spreadsheets provided on the diskette in the library reference.)

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OCA/USPS-T4-35. Please refer to Table 7, page 22. For each cell within Table 7, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.

RESPONSE: Each cell in Table 7 is derived by multiplying the number in the corresponding SIC and Employee Size cell in Table 1 by the percentages in Table A below. Some of the numbers may not correspond exactly with the numbers in Table 7 due to rounding errors because the percentages below are shown with only four decimal places.

Table A

<u>Invoices &amp; Statements</u>				
<u>SIC Group</u>	<u>Employee Size Group</u>			<u>Total Establishments</u>
	<u>1</u>	<u>2</u>	<u>3</u>	
1	21.7633%	45.0936%	4.3859%	25.5782%
2	19.7617%	23.8078%	0.0000%	20.2176%
3	49.0096%	20.5586%	11.7639%	43.6364%
4	32.6033%	30.0891%	12.7129%	32.0041%
<b>Total</b>	28.2909%	30.8755%	7.2306%	<b>28.3520%</b>
<u>Announcements &amp; Confirmations</u>				
<u>SIC Group</u>	<u>Employee Size Group</u>			<u>Total Establishments</u>
	<u>1</u>	<u>2</u>	<u>3</u>	
1	10.4021%	8.4169%	33.4471%	10.6080%
2	11.4713%	10.2835%	5.9310%	11.2042%
3	25.4976%	41.0276%	66.8096%	28.8557%
4	16.3561%	25.7715%	34.4211%	17.8185%
<b>Total</b>	14.6184%	18.0834%	32.0226%	<b>15.4370%</b>

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<u>Advertising Mail</u>				
<u>SIC Group</u>	<u>Employee Size Group</u>			<u>Total Establishments</u>
	<u>1</u>	<u>2</u>	<u>3</u>	
1	2.4254%	0.4567%	3.3762%	2.0908%
2	13.4107%	6.1893%	0.0000%	12.0252%
3	25.2252%	20.2073%	105.9904%	26.0472%
4	9.4400%	14.1244%	30.5032%	10.3349%
<b>Total</b>	10.6428%	8.8229%	24.4181%	<b>10.5828%</b>
<u>Newsletters</u>				
<u>SIC Group</u>	<u>Employee Size Group</u>			<u>Total Establishments</u>
	<u>1</u>	<u>2</u>	<u>3</u>	
1	1.8611%	4.8363%	10.9191%	2.6249%
2	4.2811%	4.5692%	16.7533%	4.4766%
3	19.8941%	31.2551%	53.6145%	22.4216%
4	16.6365%	27.8946%	91.1343%	19.1178%
Total	10.4161%	15.1099%	45.0099%	<b>11.7029%</b>
<u>Forms</u>				
<u>SIC Group</u>	<u>Employee Size Group</u>			<u>Total Establishments</u>
	<u>1</u>	<u>2</u>	<u>3</u>	
1	4.6618%	14.5636%	19.2993%	6.8224%
2	8.0384%	4.4104%	3.3540%	7.3664%
3	32.6352%	36.7396%	12.9783%	32.9032%
4	15.8818%	22.0948%	87.8576%	17.6787%
<b>Total</b>	12.9509%	16.0940%	38.8695%	<b>13.8570%</b>

**DECLARATION**

I, Beth B. Rothschild, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Beth B. Rothschild

Dated: 8/24/22

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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Scott L Reiter

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